



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

MAR 10 2006

THE ASSISTANT SECRETARY

Dr. June St. Claire Atkinson
Superintendent of Public Instruction
North Carolina Department of Education
Education Building
301 North Wilmington Street
Raleigh, NC 27601-2825

Dear Dr. Atkinson:

Thank you for submitting a proposal for consideration to participate in the Secretary's growth model pilot, which will allow selected States to use a growth-based accountability model to meet the goals of the No Child Left Behind Act (NCLB). Each proposal is being reviewed internally to determine how well it meets the seven core principles laid out in the Secretary's November 21, 2005 letter, making it eligible to advance to peer review.

The initial review of North Carolina's proposal indicates additional information is needed to determine how it meets the seven core principles. I remind you that an expected result from the pilot project is the ability to analyze how growth serves as a measure of accountability in comparison to the current status model. In accordance with Principle 4, such a comparison is only possible when a growth model and its growth targets are applied to all students and not only to students who missed the proficiency target. As we discussed in our March 9, 2006 phone call, please provide information to answer the following questions found in the Department's peer review guidance (please see www.ed.gov/policy/elsec/guid/growthmodelguidance.doc for that information). The reference in parenthesis is to that particular element in the guidance document:

Principle 1. Universal proficiency

- Has the state proposed a technically and educationally sound method of making annual judgments about school performance using growth? (Principle 1.3)
 - Has the state adequately described how annual accountability determinations will incorporate student growth? (Principle 1.3.1)
 - Additional information on the impact of the growth model to the number of schools or LEAs who would make AYP would be beneficial.

Principle 2. Establishing appropriate growth targets at the student level

- Has the state proposed a technically and educationally sound method of depicting annual student growth in relation to growth targets? (Principle 2.1)
 - Has the state adequately described a sound method of determining student growth over time? (Principle 2.1.1)

- How will the state handle fluctuating score of students? For example, how will growth be applied to students who are below proficient in year 1, proficient in year 2, and then below proficient in year 3?
- Are growth targets revised based upon fluctuating achievement or does the 4-year clock on growth begin with the first non-proficient score and continue on the same slope regardless of how much growth is found in the intervening years? Will the slope be recalculated?
- Please clarify the process of determining the greater growth trajectory as provided in Appendix A of the proposal.

Principle 4. Inclusion of all students

- Does the state's growth model proposal address the inclusion of all students, subgroups, and schools separately? (Principle 4.1)
 - Does the state's growth model address the inclusion of all students appropriately? (Principle 4.1.1)
 - Please provide clarification and justification for how LEP students and students with disabilities taking alternative assessments will be taken into account with this model.
 - Please clarify whether the growth model will be applied to all students in the every school in the state.

Principle 5. State assessment system and methodology

- How will the state report individual student growth to parents? (Principle 5.2)
 - How will an individual student's academic status be reported to his or her parents in any given year? What information will be provided about academic growth to parents? Will the student's status compared to the state's academic achievement standards also be reported? (Principle 5.2.1)
 - Please clarify the type and level of reporting that will result from this growth model, whether at the state, district, school, or parent level.
- Does the statewide assessment system produce comparable information on each student as he/she moves from one grade level to the next? (Principle 5.3)
 - Has the state used any "smoothing techniques" to make the achievement levels comparable and, if so, what were the procedures? (Principle 5.3.4)
 - Please clarify whether any smoothing techniques will be used in this model and provide information on how these will be calculated.
 - Please clarify the minimum N that will be used in the growth model. Please also clarify what happens in the case where there is missing or unmatched data for students or in the case of new students without longitudinal data, and the minimum N is not met for the growth model.

Principle 6. Tracking student progress

- Has the state designed and implemented a technically and educationally sound system for accurately matching student data from one year to the next? (Principle 6.1)
 - How does the proposed state growth accountability model adjust for student data that are missing because of the inability to match a student across time or because a student moves out of a school, district, or the state before completing the testing sequence? (Principle 6.1.6)
 - Please clarify how students who are new to the school will be treated in the growth model.
 - Please clarify how scores will be tracked across schools and whether and how the growth trajectory follows students across schools and LEAs.

As we discussed in our March 9, 2006 phone call, we would look more favorably upon a growth model proposal that does not include any additional cohort safe harbors. The additional information you provide will be considered an addendum to North Carolina's original application and will be included in the review process for the pilot. **The information should be submitted no later than March 17, 2006.** Please provide the information to Dr. Catherine Freeman at catherine.freeman@ed.gov.

I appreciate your interest in the growth model pilot. If you have any questions regarding this request, please contact Dr. Freeman at the email address above or by calling (202) 401-0113. I thank you in advance for your response.

Sincerely,



Henry L. Johnson

cc: Janice Davis, Deputy State Superintendent
Howard Lee, Chair of the State Board of Education
Lou Fabrizio
Lynn Warren